

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
BIG LOTS, INC., <i>et al.</i> ,)	Case No. 24-11967 (JKS)
)	
Debtors. ¹)	(Joint Administration Requested)
)	Re: D.I. 13

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE, that the undersigned counsel hereby enters his appearance for TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*, Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of all pleadings, motions, notices and other papers filed or served in this bankruptcy case, be served upon TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP through their undersigned counsel, as follows:

David P. Primack (#4449)
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Wilmington, DE 19801
(302) 657-2100
DPrimack@mgmlaw.com

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin- Granville Road, Columbus, OH 43081.

PLEASE TAKE FURTHER NOTICE, that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of financial affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to constitute a waiver of any substantive or procedural right of TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP including, without limitation, (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP expressly state otherwise, TKG Sheridan Crossing Dev LLC, GKT University Square Greeley, TKG Norwichtown Commons, LLC, The Paducah Development LP and THF Greengate East Dev LP do not consent to

the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

MANNING GROSS + MASSENBURG LLP

/s/ David P. Primack

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Attorney for TKG Sheridan Crossing Dev LLC, GKT

University Square Greeley, TKG Norwichtown Commons,

LLC, The Paducah Development LP and THF Greengate

East Dev LP

CERTIFICATE OF SERVICE

I, David P. Primack, hereby certify that, on this 11th day of September 2024, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* to be served *via* CM/ECF on all parties who have registered for electronic service in these cases.

Dated: September 11, 2024

/s/ David P. Primack

David P. Primack (#4449)

MANNING GROSS + MASSENBURG LLP